

Rocky Flats Citizens Advisory Board Recommendation 98-7

to the U.S. Department of Energy

Comments on *Accelerating Cleanup: Paths to Closure*

Approved May 7, 1998

The Rocky Flats Citizens Advisory Board (RFCAB) appreciates the opportunity to provide comments on *Accelerating Cleanup: Paths to Closure* draft document (hereafter "Accelerating Cleanup"). These comments pertain to the national and Rocky Flats version of this document.

Because "Accelerating Cleanup" is a revision of the Ten Year Plan and the 2006 Plan on which we have already commented, we keep our comments here brief. We ask the Department of Energy (DOE) to review our comments on those documents as many of our points remain germane. Further, we expect to have continued input into development and execution of projects (i.e. the 29 Project Baseline Summaries), and the Integrated Priority List.

In developing a plan for cleanup of the Rocky Flats Site, RFCAB believes that DOE must pay attention to the following points:

1. While supporting the goal of expedited cleanup of Rocky Flats, RFCAB believes that time and cost should not be the primary drivers of this plan. Elimination or reduction of risk to workers, the public, and the environment should drive any cleanup. RFCAB is concerned that cleanup and risk reduction activities be done well and that they be done safely.
2. RFCAB is concerned that current cleanup plans rely on assumptions that may prove false. We again urge the department to plan "ready-to-implement" contingencies for these assumptions. The primary areas of concern are:
 - Waste and nuclear materials management decisions
 - Cleanup levels

Waste and Materials

The Department of Energy is relying on offsite options for all waste and nuclear materials. These

offsite options may be delayed or never come to fruition. It is imperative that the Department have contingency waste storage plans so that cleanup may proceed at the site.

Cleanup Levels

At the urging of RFCAB and other community entities, DOE has agreed to fund a review of the Soil Action Levels for plutonium. This process is just beginning. DOE needs to demonstrate how more stringent levels might impact the cleanup process, and that the site is able to accommodate such a change from a cost and schedule perspective.

3. RFCAB is concerned that DOE-Headquarters is sending the wrong signal to Congress by seeming to promise a 2006 or 2010 closure. Cleanup and closure of Rocky Flats is a very complicated undertaking and any number of issues (internal to Rocky Flats or external) may arise that will delay current projections. Therefore, we urge DOE to be careful to describe the challenging nature of cleanup, and that 2006/2010 are goals the site is striving to achieve.
4. Because DOE is relying on questionable offsite options for waste and material disposition, RFCAB again calls for coordinated national process (note - not a workshop) to help ensure that DOE is developing publicly-acceptable and scientifically-credible decisions for waste and materials.

Again, we thank you for the opportunity to comment on the "Accelerating Cleanup" plan.

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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